RCRA RECORDS CENTER
FACILITY CEE ASSOC
I.D. NO. CTD044121697
FILE LOC. R-13
OTHER #103217

Environmental
Resources
Management

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December 19, 2005

Ms. Stephanie Carr
RCRA Facility Manager
United States Environmental Protection Agency
New England Region
1 Congress Street, Suite 1100
Boston, MA 02114-2023

RE: Former CEE Associates Limited Partnership Property
80 Pickett District Road (the "Site")
New Milford, Connecticut

Dear Ms. Carr:

In correspondence dated July 5, 2005, the Environmental Protection Agency (EPA) indicated that it had reviewed the 2004 Annual Report on the Status of Remediation (Annual Report) for the above mentioned Site, prepared by ERM-New England, Inc. (ERM). In the July 5 letter, EPA presented general and specific comments regarding the status of the work as it relates to the RCRA Corrective Action program. EPA also provided comments regarding its assessment of the work as it relates to the Migration of Contaminated Groundwater Under Control (CA 750). Finally, EPA requested a general status update of remediation at the Site, including certain reports and documents.

ERM drafted this response to address EPA's comments and included a schedule outlining plans for completing the characterization and remediation of contamination associated with the Site. To simplify EPA's review, ERM responded to each item as presented in the July 5, 2005 correspondence.

RDMS DocID 103217

Section I - Comments on Report

General Comments

1. Soil Vapor Analyses

Acetone and 2-butanone will be included in future soil vapor analyses as requested. It should be noted that these compounds have been found to be extremely minor constituents of the VOCs in the soil vapor. It is anticipated that the remediation program, which is driven by the presence of PCE, TCA, and

other chlorinated VOCs at much higher concentrations, will address any concerns with such other minor constituents.

2. Groundwater Samples for Neeltran Property

In 2004, ERM obtained access to monitoring wells on the Neeltran property. Well *MW-17* has been identified as the most critical well, and will be used in the remedial groundwater monitoring program, as well as in the compliance and post-compliance monitoring phases required under the RSRs. As such, multiple samples from this monitoring point (and others) are anticipated over the next several years to demonstrate plume stability and the effectiveness of remediation. This data will also be useful in evaluating consistency with CA 750EI, Migration of Contaminated Groundwater Under Control requirements.

3. VOCs in Bedrock

ERM has reviewed a 1993 report (prepared by HRP Associates) that described an investigation of the Neeltran facility. In the 1993 report, a number of well logs were presented, including those which described the monitoring wells installed on the Neeltran property. A construction log for *MW-17* was not included in the report, but based on past practices and experience, ERM assumed that the well is an overburden well.

Historical concentrations of VOCs (primarily TCA and DCE) were found in well *PW-1*, the up-gradient monitoring well on the CEE Site. The most down-gradient well (*BR-5*) was found to contain VOCs (TCA and TCE), as well as breakdown by-products (cis-12DCE and 11DCE). Over a one-year period (from 2003 to 2004), these concentrations decreased by nearly 50%. While additional sampling is needed to confirm this trend, it appears that natural attenuation will ultimately address the VOCs in bedrock groundwater.

Finally, in the most recent groundwater sampling event, the VOCs in monitoring well *BR-5* did not exceed the SWPC. Volatilization Criteria are not applicable, since the Volatilization Criteria apply only to substances within 30 feet of the ground surface, and the ERM samples were taken at greater than 60 feet below the ground surface. The overburden monitoring well "paired" with *BR-5* (*ERM-15*) did not contain VOCs above laboratory detection limits, which further supports the conclusion that the VOCs in *BR-5* are isolated.

Additional efforts for this media are anticipated to include continued monitoring

of bedrock groundwater to confirm natural attenuation processes and performance of additional characterization procedures to better assess VOC sources. Should natural attenuation not be satisfactorily demonstrated, the performance of additional (off-site) bedrock groundwater investigation will be considered.

It should be noted that historical data collected from the up-gradient bedrock production well on this Site was found to contain significant concentrations of similar VOCs (TCA and DCE). If the presence of VOCs in the bedrock is shown to be from an off-site source, under CT DEP policy the down-gradient property owner is not responsible for any investigation/remediation efforts pertaining to that plume.

4. Elevated Detection Limits in Four Specified Groundwater Samples

A review of the itemized samples noted that the minimum laboratory detection limits for these samples were elevated when compared to analyses of samples containing lower concentrations of VOCs. The laboratory provided no specific explanation for the variation, but interference problems are normally cited for such conditions, and the elevated RDLs likely resulted from the dilution of those samples prior to analysis.

At this time, the detection limit issue is not a critical concern. Most of the data was collected to assist in the design of the treatment system, and to a general extent, the driver for the remediation was TCE. As the concentrations of TCE will be reduced over time, we also anticipate a drop in RDLs to levels below applicable remedial criteria.

Detection limits will be a concern when the assessment of compliance is performed following remediation. If detection limits are found to be elevated, they will be evaluated against appropriate RSR compliance criteria (R VC, I/C VC, or SWPC). If the detection limits for any compound are found to exceed the published criteria, then the laboratory will be contacted to explain the problem and/or to re-run the sample using alternative methodology such that the minimum detection limit is equal to or less than the published criteria. If necessary, additional samples will be collected (and analyzed) for those locations where detection limits are an issue.

During compliance monitoring, if detection limits are found to be elevated, but no detection limit exceeds the published RSR criteria for a specific compound,

the data will be accepted as valid, and no additional evaluation will be performed.

5. Stormwater Vault

Please note that the vault area was investigated in 2002, when a sample of the vault contents was obtained, and a series of four (4) soil borings were performed surrounding the vault (*9B-4, -5, -6,* and *-7*). Soil collected from these borings was found to contain TPH (at some locations above the RDEC), but no VOCs were noted above trace levels. In addition, soil vapor samples were collected in 2002 along the length of the feed pipes to the vault. No VOCs were detected above minimum laboratory detection limits. Therefore, the investigation of this AOC (AOC-9) is complete, no significant residual of VOCs in the soil was indicated, and remediation of affected groundwater will be performed using the AS/SVE system.

Specific Comments

6. Section 2.2: VOCs in Soil Vapor Beneath AOC-5.

The presence of low levels of 111-TCA is noted. While 111-TCA was present, the driver for the remedial effort remains TCE, which has been the focus of the investigation/remedial design efforts to date.

7. Section 2.3.1 Site Groundwater Sampling Program

As in the preceding comment, TCE has been (and will continue to be) the primary focus of the remedial effort for VOCs. Other VOCs are regularly evaluated but are not specifically discussed due to their lower concentrations.

8. Section 2.5 Revisions to Conceptual Site Model

To clarify the description in the Annual Report, there were two primary source areas for VOCs in groundwater [one along the south portion of the building (AOC-9), and one near the center (AOC-5), not just a single one (along the southern portion of the building)] as had been previously assumed. As is shown in Figure 7 of the Engineering Design Report (attached), these plumes commingle beneath the building. The centerline of the combined plumes can be

observed through a review of the layout of the air sparge points within and adjacent to the building (see Figure 3, from AS/SVE Design, attached).

9. Section 3.2 Anticipated Activities

The air sparge and soil vapor extraction points have been installed. On-going groundwater monitoring will be conducted in support of the remedial effort on a semi-annual basis to assess the effectiveness of the program. Use of *MW-17* on the Neeltran property has been made available through an access agreement with the owners of that property. It will serve as a critical means of assessing the remedial program.

10. Appendix B, Table 4

Future tables will be modified to highlight samples which exceed the proposed soil vapor standards.

11. Appendix C

A figure which lays out specific AOCs on-site will be included in future reports.

12. Appendix C, Figure 2

The figure will be updated to indicate the nomenclature for sampling locations (See Attached).

13. Appendix D, Neeltran Documentation

ERM requested data for monitoring wells *MW-1*, *MW-7*, *MW-8*, and *MW-17*. The data from *MW-17* was the only data made available to ERM. To the best of our knowledge and belief, it is the most recent data available. The other named wells may have been destroyed, as recent construction on the Neeltran property has been on-going in the areas where these wells were located.

14. Appendix E, Pilot Study Work Plan

The locations of all existing/proposed AS and SVE points are included on Figure 3 from the AS/SVE Design (attached).

15. Appendix B, Table 3

Table 3 has been re-formatted and is attached.

16, 17, 18. Appendix B, Table 4

A revised Table 4 is attached.

19. Human Exposures Under Control

ERM has had frequent meetings with property managers at Edelman to discuss the remedial effort. Edelman is aware of the presence of VOCs in soil vapor beneath the building, and has been receiving copies of Annual Reports indicating that presence since 2001. To ensure actual knowledge, ERM recently sent specific notification to Edelman stating that VOCs are present beneath the building (copy attached).

20. Additional Bedrock Groundwater Investigation

ERM plans to prepare a cross-section of the overburden materials on the Site to be included in the next Annual Report. It is attached for your immediate review.

III Next Steps

Please note the following in regards to the concerns raised in this section:

- ERM will begin operation of an AS/SVE system on the Site by December 31, 2005. The sparge system includes a "sparge wall" at the property boundary (see Figure 3), which will minimize or eliminate migrating VOCs in the groundwater. As such, the plume will not only be "stabilized', but will decrease in size. ERM anticipates completion of remediation of the plume within two (2) years after system initiation.

- ERM's approach to bedrock groundwater is to evaluate the natural attenuation of VOCs in the groundwater as remediation progresses. Should further attenuation not be observed, or should VOCs be found to increase in the media, evaluation of additional data collection options (including off-site) will be performed.

- A QAPP meeting the EPA Brownfields Guidance will be prepared prior to the next round of groundwater sampling and will be used for all future data collection efforts.

ERM's schedule for the former InteliData facility is a s follows:

Remedial construction and system start-up are anticipated to be completed by December 31, 2005. Both AS and SVE points have been installed. The system equipment is on order and delivery is anticipated by mid-December.

Following system start-up, ERM anticipates two (2) years of system operation to address the known contamination. Semi-annual groundwater monitoring will be conducted during this period to assess the effectiveness of the system.

Following completion of remediation, quarterly groundwater monitoring will be conducted on all wells for a two-year period. So long as no parameters exceed appropriate RSR criteria during that monitoring period, remediation will be be complete on or about 2009/2010.

If you have any questions or need additional information, please feel free to call us at (860) 524-5678.

Regards,

Robert J. Drake, PE, Ph.D., LEP.
Senior Project Manager

Kevin P. King, LEP
Principal

Attachments
cc: Joshua A. Creem, Esq., Corillian
Andrew N. Davis, Esq., LeBoeuf, Lamb, Greene & MacRae LLP

Memorandum

Environmental Resources Management, Inc.

Two Hartford Square West
146 Wyllys Street, Suite 300
Hartford, CT 06106

(860)-524-5678
(860)-524-5680 Fax

To:	Barry Keller, Teddy & Arthur Edelman, LTD
From:	Robert J. Drake, PE, Ph.D., LEP
Date:	September 30, 2005
Subject:	Notice of Envioronmental Conditions 80 Pickett District Road, New Milford, Connecticut ERM Project No. 0016718

Mr. Keller:

As you are aware, ERM-New England, Inc. (ERM) has been performing environmental remediation efforts at the 80 Pickett District Road Site on behalf of C.E.E. Associates Limited Partnership as part of its obligations as the Certfying Party pursuant to the Connecticut Transfer Act (Connecticut General Statutes §22a-134 et seq.) in the context of the sale of the property in January, 2000. ERM, the designated Licensed Environmental Professional (LEP) for the Site is in the process of implementing the full scale soil vapor extraction (SVE) and air sparge systems to treat the soil and groundwater beneath the building.

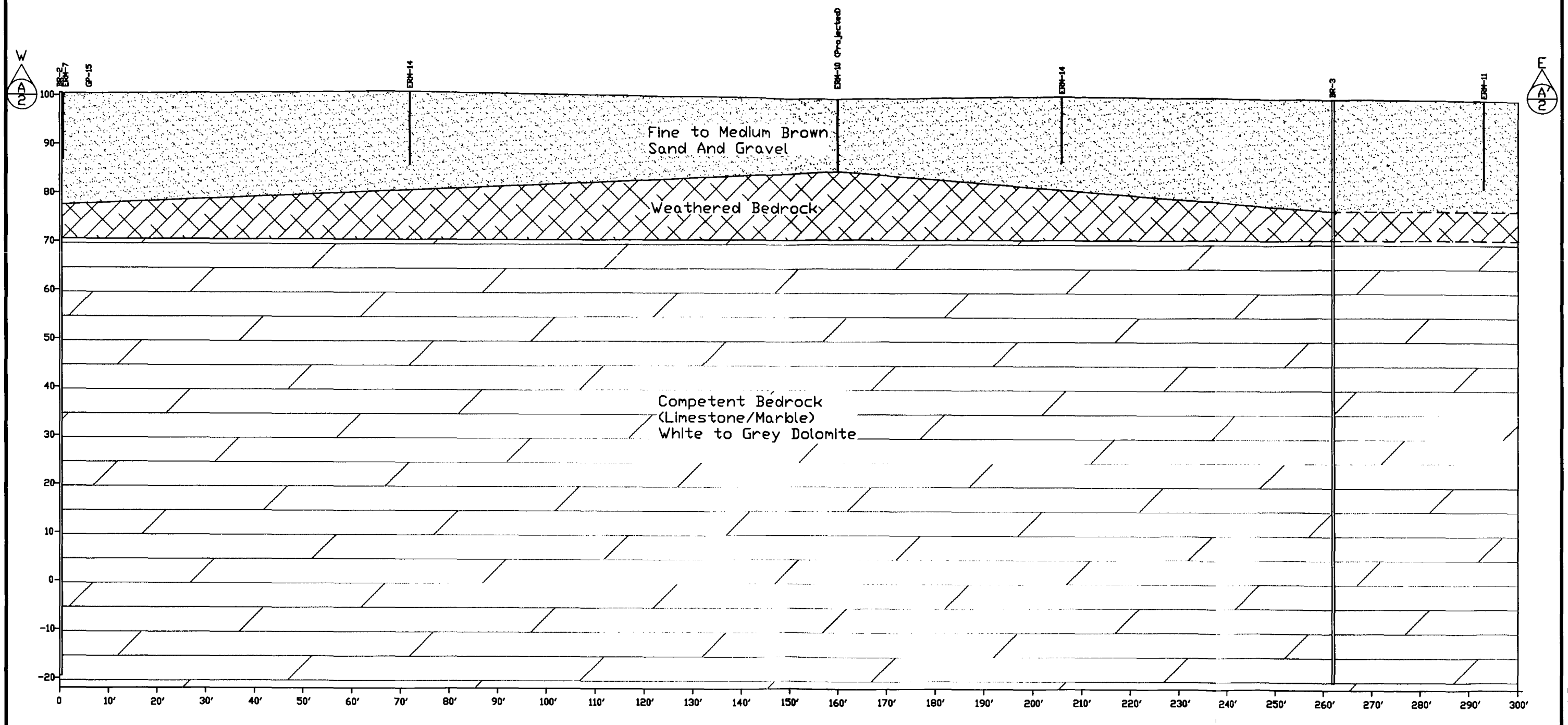
Please note that the remediation system involves the injection of air into the groundwater beneath the building through sparge points, to transfer volatile organic compounds (VOCs) into the soil vapor, where they can be recovered by the SVE system.

While the SVE system is designed to remove all VOC-laden vapor, it is a requirement that we make you be aware that VOCs in soil vapor are and will be present beneath the floor slab until the completion of the remedial process.

The active remediation system is anticipated to be installed and operational before the end of the year.

Please call me at (860) 524-5678 if you have any questions.

cc: A. Davis, Esq.
K. King, LEP
A. Corletto, Esq.
S. Carr, U.S. EPA



Legend

ERM/MW - Overburden Monitroing Well
BR - Open Hole Bedrock Monitoring Well

Not to Scale

Figure 1 - Cross Section From A (BR-2) to A' (ERM-11)
Refer to Figure 3 For Section Line
80 Pickett District Road, New Milford, Connecticut

ERM

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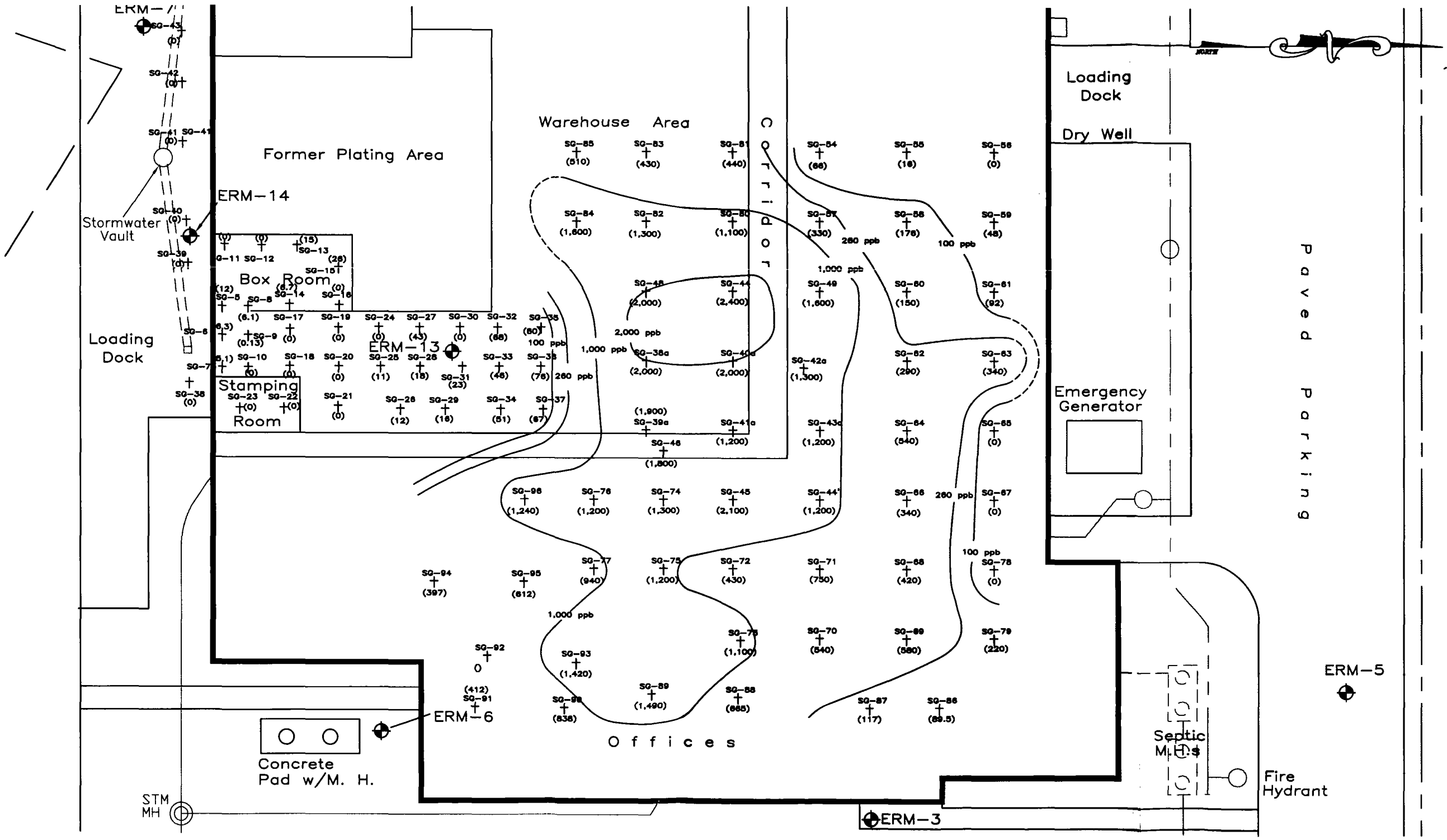

LEGEND

SG-18 + Soil Gas Sampling Point

(45.0) TCE Concentration (ppb)

Scale (1"=30')

15 0 7.5 15 30 60

Figure 2 - TCE ISOCONS
80 Pickett District Road, New Milford, CT

ERM

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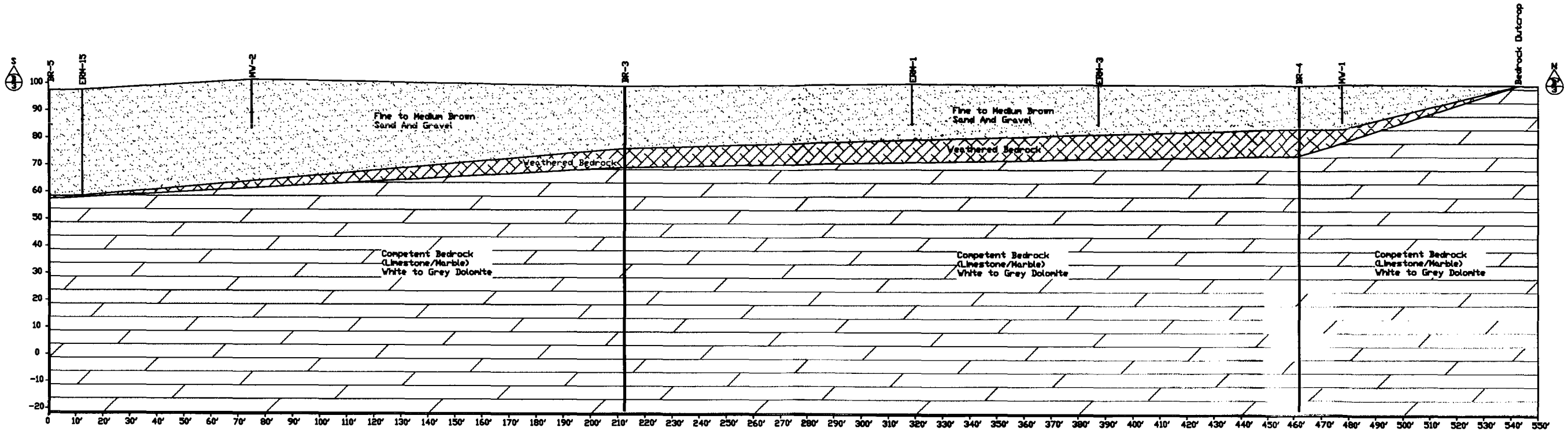

Legend

ERM/MW - Overburden Monitoring Well
BR - Open Hole Bedrock Monitoring Well

Not to Scale

Figure 2: Cross Section From B (BR-5) to B' (Outcrop on Northern Edge of Site)
Refer to Figure 3 For Section Line
80 Pickett District Road, New Milford, Connecticut

ERM

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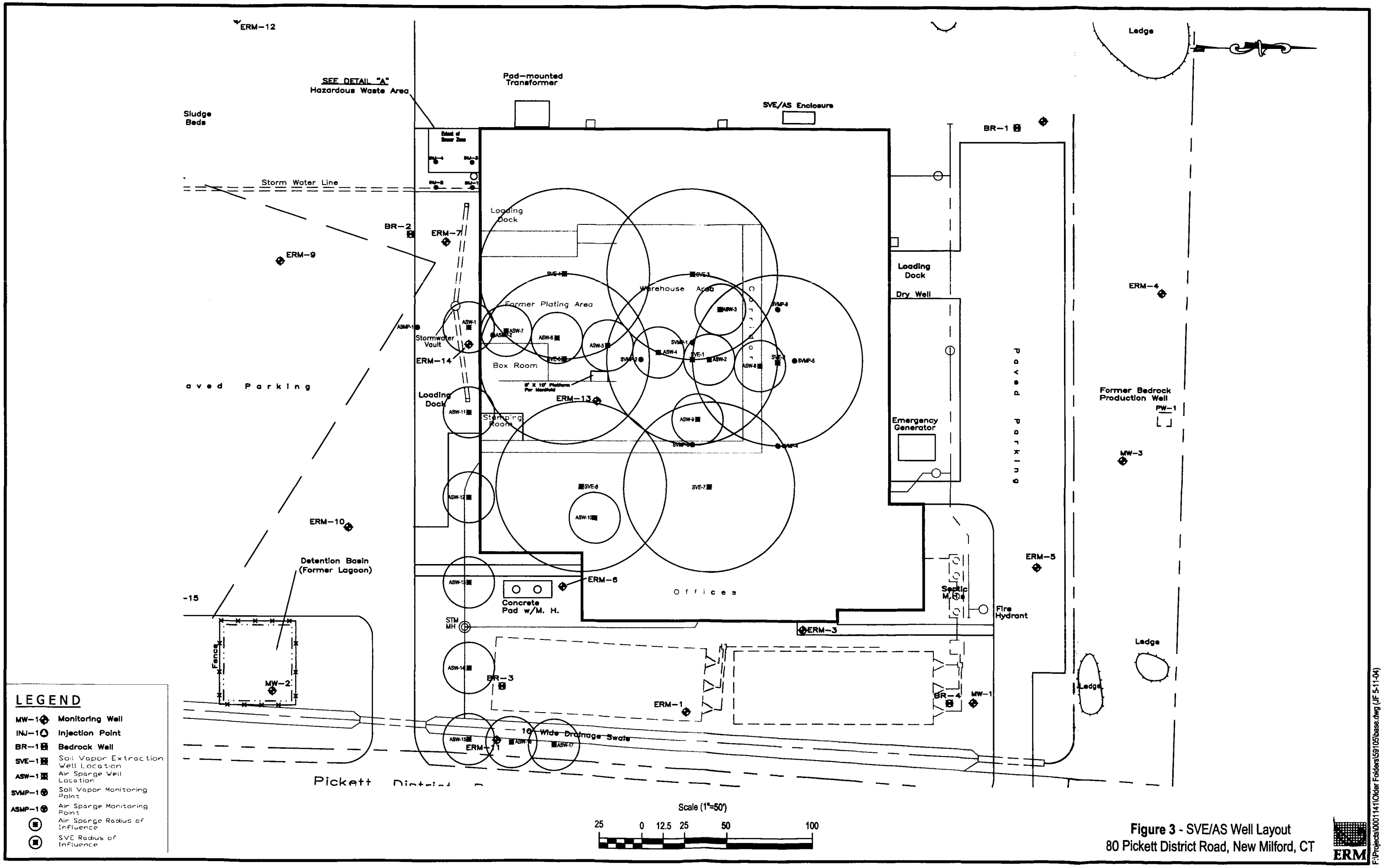

Figure 3 - SVE/AS Well Layout
80 Pickett District Road, New Milford, CT

ERM

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ANIMAL CONTROL SHELTER

Former Sludge Drying Beds

Storm Water Line

ERM-2

ERM-9

ERM-10

Paved Parking

Detention Basin (Former Lagoon)

BR-5 B

ERM-15

Fence

MW-2

BR-2

ERM-7

Loading Dock

Stormwater Vault

ERM-14

Box Room

ERM-13

Stamping Room

Former Plating Area

Warehouse Area

Corridor

ERM-16

ERM-17

ERM-8

BR-1

Loading Dock

Dry Well

Paved Parking

ERM-4

INDUSTRIAL (CHEMICALY CLEAN)

Former Bedrock Production Well

PW-1

MW-3

ERM-5

ERM-6

Concrete Pad w/M. H.

Offices

STM MH

ERM-3

BR-3

ERM-1

BR-4

MW-1

A

A'

B

B'

Ledge

Ledge

16' Wide Drainage Swale

ERM-11

Pickett District Road

LEGEND

MW-1 Monitoring Well

INJ-1 Injection Point

BR-1 Bedrock Well

Scale (1"=50')

25 0 12.5 25 50 100

Figure 3 - Cross Section Line
80 Pickett District Road, New Milford, Connecticut

ERM

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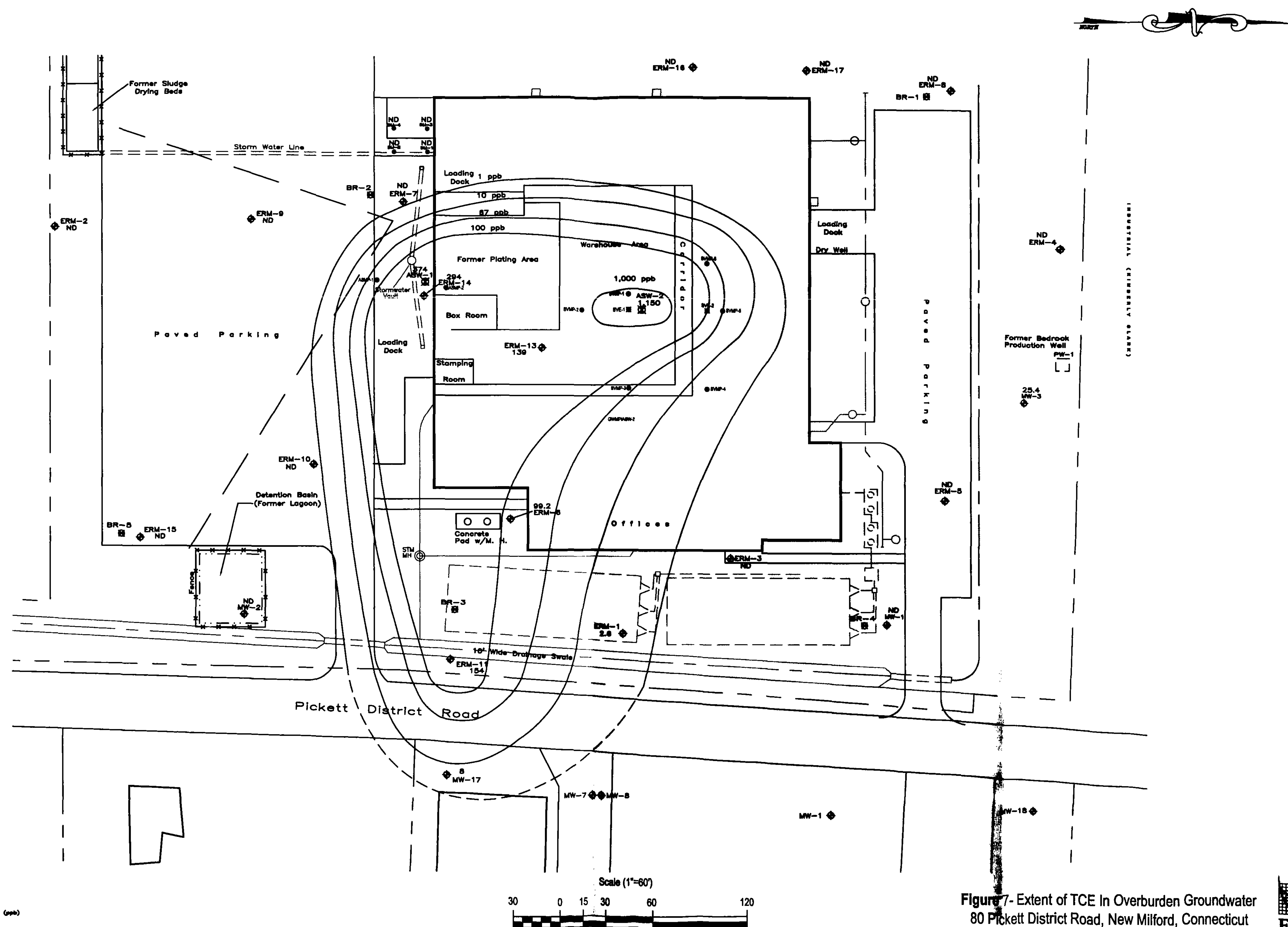

LEGEND

MW-1 Monitoring Well
INJ-1 Injection Point
BR-1 Bedrock Well
TCE Isocons
294 TCE Groundwater Concentration (ppb)

Figure 7- Extent of TCE In Overburden Groundwater
80 Pickett District Road, New Milford, Connecticut

ERM

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Table 3: AOC-7 Site Groundwater
Bedrock Groundwater
Intelidata
New Milford, Connecticut

ERM ID #	SWPC	New Res. VC	New I/C VC	BR-1		BR-2		BR-3		BR-4		PW-1	BR-5	
Date Sampled				8/21/2001	2/24/2004	8/21/2001	2/25/2004	8/21/2001	2/25/2004	8/21/2001	2/25/2004	21/2001	6/3/2003	2/25/2004
Lab ID #				AC66173	SA08749-01	AC66174	SA08839-04	AC66175	SA08839-09	AC66176	SA08839-02	C66177	AD91058	SA08839-07
Time Collected				14:35	11:25	14:55	11:15	14:50	15:25	14:40	9:50	16:00	14:45	13:45
VOCs (ug/L)														
1,4 Dioxane	**NE**	**NE**	**NE**	ND	<10	NT	<10	NT	<50	NT	ND	NT	NT	<50
Bromomethane	**NE**	**NE**	**NE**	ND	ND	ND	ND	ND	ND	ND	4	ND	ND	ND
Chloroethane	**NE**	**12,000**	**29,000**	ND	ND	ND	ND	ND	ND	ND	ND	4	ND	ND
1,1-Dichloroethane	**NE**	**3,000**	**41,000**	ND	ND	ND	ND	94	51	ND	ND	60	160	99.6
1,2-Dichloroethane	**2,970**	**6.5**	**90**	ND	<1	ND	<1	2	<5	ND	ND	ND	2.1	<5
1,1-Dichloroethene	**96**	**190**	**920**	ND	ND	ND	ND	**200**	34.4	1.1	ND	45	160	84.9
cis-1,2-Dichloroethene	**NE**	**830**	**11,000**	ND	ND	ND	ND	27	23.4	ND	ND	5.8	ND	13.2
Tertachloroethene	**88**	**340**	**810**	ND	ND	ND	ND	8.8	ND	ND	ND	1.4	1.1	ND
1,1,1-Trichloroethane	**62,000**	**6,500**	**16,000**	ND	ND	ND	ND	1,900	481	ND	ND	250	200	89.3
1,1,2-Trochloroethane	**1,260**	**220**	**2,900**	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.1	ND
Trichloroethene	**2,340**	**27**	**67**	ND	ND	ND	ND	**190**	**98.8**	ND	ND	34	**130**	**71.9**
Total RCRA Metals (mg/L)														
Barium	**NE**	**NA**	**NA**	0.0051	NT	0.0182	NT	0.0256	NT	0.0120	NT	0.0320	ND	NT
Chromium	**NE**	**NA**	**NA**	NT	NT	NT	ND	NT	ND	NT	NT	NT	NT	ND
Iron	**NE**	**NA**	**NA**	NT	NT	NT	1.0000	NT	3.0900	NT	NT	NT	NT	8.87
Potassium	**NE**	**NA**	**NA**	NT	NT	NT	3.3000	NT	7.8800	NT	NT	NT	NT	5.51
Manganese	**NE**	**NA**	**NA**	NT	NT	NT	0.0204	NT	0.0540	NT	NT	NT	NT	0.0679
Zinc	**0.123**	**NA**	**NA**	ND	NT	ND	NT	ND	NT	ND	NT	ND	0.0077	NT
CT ETPH (mg/L)	**NE**	**NA**	**NA**	NT	ND	NT	NT	NT	ND	NT	ND	NT	NT	NT
Cyanide (mg/L)	**0.052**	**NA**	**NA**	NT	NT	NT	ND	NT	ND	NT	NT	NT	NT	NT

ND - Concentrations are below laboratory detection limits
NA - Not applicable
NT - Not tested
NE - Criteria not established

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-1	SG-2	SG-3	SG-4	SG-5	SG-6	SG-7	SG-8	SG-9	SG-10
Date Sampled			4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001
Lab ID #			AC42756	AC42757	AC42758	AC42759	AC42760	AC42761	AC42762	AC42763	AC42764	AC42765
Time Collected			8:37	8:54	9:10	9:27	9:56	10:17	10:35	10:55	11:13	11:30
VOCs (ppbv)												
1,1 Dichloroethane	14,000	150,000	14	15	6.4	10	ND	ND	ND	ND	ND	ND
1,1 Dichloroethene	1,900	7,000	51	65	29	34	ND	ND	ND	ND	ND	ND
cis-1,2 Dichloroethene	3,400	35,000	7.5	6.8	ND	5	ND	ND	ND	ND	ND	ND
Methylene Chloride	650	6,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Teterachloroethene	560	1,000	8	6.6	ND	5.2	ND	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	1,400	15,000	5.6	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	70,000	150,000	3000	3,600	2,100	2,400	240	120	100	340	130	110
Trichloroethene	140	260	80	80	44	64	12	6.3	5.1	6.1	ND	ND
Toluene	42,000	180,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-11	SG-12	SG-13	SG-14	SG-15	SG-16	SG-17	SG-18	SG-19	SG-20
Date Sampled			4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001	4/23/2001
Lab ID #			AC42766	AC42767	AC42768	AC42769	AC42770	AC42771	AC42772	AC42773	AC42774	AC42775
Time Collected			11:52	12:10	13:30	13:47	14:05	14:22	14:40	14:58	15:15	15:32
VOCs (ppbv)												
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	7.0	ND	11	ND	ND	ND	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	ND	ND	12.0	5.2	13	ND	ND	6.7	ND	ND
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	6.4	ND	ND	ND	ND	ND
Methylene Chloride	**650**	**6,800**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Teterachloroethene	**560**	**1,000**	ND	ND	ND	ND	5.7	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	170	230	670	420.0	1300	ND	45	210	120	31
Trichloroethene	**140**	**260**	ND	ND	15	6.7	26	ND	ND	ND	ND	ND
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND - Concetrations are below laboratory detection limits

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-21	SG-22	SG-23	SG-24	SG-25	SG-26	SG-27	SG-28	SG-29	SG-30
Date Sampled			4/23/2001	4/23/2001	4/23/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001
Lab ID #			AC42776	AC42777	AC42778	AC42782	AC42783	AC42784	AC42785	AC42786	AC42787	AC42788
Time Collected			15:50	16:07	16:24	8:15	8:32	8:48	9:22	9:39	9:05	9:55
VOCs (ppbv)												
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	ND	ND	ND	ND	14	5.7	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	ND	ND	ND	ND	23	12	28	14	35	ND
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	ND	ND	6.8	ND	ND	ND
Methylene Chloride	**650**	**6,800**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Teterachloroethene	**560**	**1,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	6.3	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	150	60	64	70	870	710	2,000	810	1,300	ND
Trichloroethene	**140**	**260**	ND	ND	ND	ND	11	12	43	18	16	ND
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-31	SG-32	SG-33	SG-34	SG-35	SG-36	SG-37	SG-38	SG-39	SG-40
Date Sampled			4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001	4/24/2001
Lab ID #			AC42789	AC42790	AC42791	AC42792	AC42793	AC42794	AC42795	AC42796	AC42797	AC42798
Time Collected			10:11	10:28	10:44	11:00	11:17	11:34	11:51	12:23	12:15	13:00
VOCs (ppbv)												
1,1 Dichloroethane	**14,000**	**150,000**	6.1	18	7.6	13	17	19	16	ND	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	17	47	52	32	62	54	100	ND	ND	ND
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	8.5	5.6	6.5	8.8	9.9	8	ND	ND	ND
Methylene Chloride	**650**	**6,800**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	**560**	**1,000**	5.4	13	6.2	8.7	14	14	8.8	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	1,100	3,300	2,100	2,300	4,000	3,700	3,300	110	67	68
Trichloroethene	**140**	**260**	23	68	46	51	80	76	67	ND	ND	ND
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
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ERM ID #	New Res. VC	New I/C VC	SG-41	SG-42	SG-51	SG-52	Equip. Blank	SG-53	SG-52	SG-38a	SG-39a	SG-40a
Date Sampled			4/24/2001	4/24/2001	4/23/2001	4/23/2001	4/23/2001	4/24/2001	4/23/2001	9/18/2002	9/18/2002	9/18/2002
Lab ID #			AC42799	AC42800	AC42779	AC42780	AC42781	AC42801	AC42802	AD41098	AD41095	AD41100
Time Collected			13:20	13:40	17:20	17:24	11:35	16:30	16:50	10:02	9:18	10:30
VOCs (ppbv)												
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	ND	ND	ND	15	ND	510	430	460
1,1 Dichloroethene	**1,900**	**7,000**	ND	ND	ND	8.9	ND	48	ND	**2,600**	**2,700**	**2,100**
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	ND	7	ND	360	250	270
Methylene Chloride	**650**	**6,800**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Teterachloroethene	**560**	**1,000**	ND	ND	ND	ND	ND	11	ND	240	200	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	69	12	200	310	59	2,700	28	68,500	64,700	52,300
Trichloroethene	**140**	**260**	ND	ND	ND	ND	ND	60	ND	**2,000**	**1,900**	**2,000**
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND - Concetrations are below laboratory detection limits

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
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ERM ID #	New Res. VC	New I/C VC	SG-41a	SG-42a	SG-43a	SG-44	SG-44'	SG-45	SG-46	SG-48	SG-49	SG-54	SG-55
Date Sampled			9/18/2002	9/18/2002	9/18/2002	9/18/2002	9/18/2002	9/18/2002	9/18/2002	9/18/2002	9/18/2002	6/3/2003	6/3/2003
Lab ID #			AD41096	AD41102	AD41103	AD41099	AD41104	AD41106	AD41105	AD41097	AD41101	AD97050	AD90751
Time Collected			9:31	10:57	11:11	10:15	11:23	11:49	11:36	9:48	10:43	9:50	10:12
VOCs (ppbv)													
1,1 Dichloroethane	14,000	150,000	360	340	320	520	260	510	670	300	200	ND	ND
1,1 Dichloroethene	1,900	7,000	2000	1,600	1,400	2,300	1,500	2,000	2,700	1,700	1,200	36	20
cis-1,2 Dichloroethene	3,400	35,000	ND	ND	ND	380	ND	200	340	220	ND	ND	ND
Methylene Chloride	650	6,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	52	ND
Teterachloroethene	560	1,000	ND	ND	ND	240	ND	230	340	ND	ND	ND	ND
1,2,4 Trichlorobenzene	1,400	15,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	70,000	130,000	42,000	35,500	30,300	71,800	27,900	41,300	52,700	40,400	34,700	1,265	800
Trichloroethene	140	260	1,200	1,300	1,200	2,400	1,200	2,100	1,800	2,000	1,600	66	16
Toluene	42,000	180,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
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New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-56	SG-57	SG-58	SG-59	SG-60	SG-61	SG-62	SG-63	SG-64	SG-65	SG-66
Date Sampled			6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003
Lab ID #			AD90752	AD90753	AD90754	AD90755	AD90756	AD90757	AD90758	AD90759	AD90760	AD90761	AD90762
Time Collected			10:12	10:25	10:36	11:04	10:48	11:16	11:29	11:40	12:45	13:22	12:56
VOCs (ppbv)													
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	ND	150	92	ND	ND	ND	ND	ND	ND	ND	310
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	**650**	**6,800**	ND	370	ND	40	390	370	460	420	630	550	620
Teterachloroethene	**560**	**1,000**	ND	ND	24	ND	ND	ND	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	ND	4,600	3,350	700	4,100	2,200	9,800	6,600	21,100	8,600	14,600
Trichloroethene	**140**	**260**	ND	**330**	**176**	48	**150**	92	**290**	**340**	**540**	ND	**340**
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	64	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
Intelidata
New Milford, Connecticut

ERM ID #	New Res. VC	New I/C VC	SG-67	SG-70	SG-71	SG-72	SG-73	SG-75	SG-76	SG-77	Dup-1	Dup-2	SG-74
Date Sampled			6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/3/2003	6/4/2003
Lab ID #			AD90763	AD90764	AD90765	AD90766	AD90767	AD90768	AD90769	AD90770	AD90771	AD90772	AD90773
Time Collected			13:10	13:47	13:36	14:00	14:11	14:25	14:52	14:40			8:50
VOCs (ppbv)													
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	ND	670	820	510	1,200	1,500	1,100	900	ND	1,400	1,300
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	**650**	**6,800**	670	690	700	1,400	ND	ND	ND	ND	ND	850	860
Teterachloroethene	**560**	**1,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	5,800	16,400	24,600	16,700	45,300	42,400	47,600	32,300	3,900	43,700	54,600
Trichloroethene	**140**	**260**	ND	**540**	**750**	**430**	**1,100**	**1,200**	**1,200**	**940**	ND	**1,300**	**1,300**
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
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ERM ID #	New Res. VC	New I/C VC	SG-68	SG-78	SG-79	SG-69	SG-80	SG-81	SG-82	SG-83	SG-84	SG-85	SG-86
Date Sampled			6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	6/4/2003	4/30/2004
Lab ID #			AD90774	AD90775	AD90776	AD90777	AD90778	AD90783	AD90779	AD90782	AD90780	AD90781	SA11814-01
Time Collected			9:10	9:22	9:45	9:56	10:10	11:07	10:21	10:55	10:32	10:44	8:10
VOCs (ppbv)													
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	26	120	ND	ND	ND	ND	130	ND	ND
1,1 Dichloroethene	**1,900**	**7,000**	410	ND	280	830	450	290	680	280	1,100	320	41.7
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	66	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	**650**	**6,800**	740	860	ND	ND	ND	480	190	490	310	400	ND
Teterachloroethene	**560**	**1,000**	ND	ND	54	72	ND	ND	130	150	300	230	43.8
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	14,800	3,900	4,400	18,600	12,400	9,500	16,700	8,000	25,300	10,000	1,940
Trichloroethene	**140**	**260**	**420**	ND	**220**	**580**	**1,100**	**440**	**1,300**	**430**	**1,600**	**510**	89.5
Toluene	**42,000**	**180,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NT

Table 4: AOC-5 Former Plating Area
Summary of Soil Gas Results
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ERM ID #	New Res. VC	New I/C VC	SG-87	SG-88	SG-89	SG-90	SG-91	SG-92	SG-93	SG-94	SG-95	SG-96
Date Sampled			4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004	4/30/2004
Lab ID #			SA11814-02	SA11814-03	SA11814-04	SA11814-05	SA11814-06	SA11814-07	SA11814-08	SA11814-09	SA11814-10	SA11814-11
Time Collected			8:26	8:45	9:01	9:31	9:55	10:30	11:19	11:50	12:25	12:50
VOCs (ppbv)												
1,1 Dichloroethane	**14,000**	**150,000**	ND	ND	ND	162	124	ND	ND	ND	ND	345
1,1 Dichloroethene	**1,900**	**7,000**	49.9	431	1,020	712	384	279	1,090	446	650	1,270
cis-1,2 Dichloroethene	**3,400**	**35,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	**650**	**6,800**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Teterachloroethene	**560**	**1,000**	55.1	72	ND	ND	ND	ND	ND	ND	ND	ND
1,2,4 Trichlorobenzene	**1,400**	**15,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1 Trichloroethane	**70,000**	**130,000**	1,480	9,160	34,900	24,300	18,500	16,400	50,800	32,100	48,300	63,500
Trichloroethene	**140**	**260**	117	**665**	**1,490**	**838**	**412**	**276**	**1,420**	**397**	**612**	**1,240**
Toluene	**42,000**	**180,000**	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT

ND - Concetrations are below laboratory detection limits